

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**IN RE GOOGLE DIGITAL ADVERTISING  
ANTITRUST LITIGATION**

**No. 21-MD-3010 (PKC)**

*This Document Relates To:*

**IN RE GOOGLE DIGITAL PUBLISHER LITIGATION**

**No. 1:21-cv-7034 (PKC)**

**DEFENDANTS GOOGLE LLC, ALPHABET INC., AND YOUTUBE LLC'S NOTICE OF  
MOTION TO DISMISS PUBLISHERS'  
AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

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Inc., and YouTube LLC*

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants Google LLC, Alphabet Inc., and YouTube LLC's Motion to Dismiss Publishers' Amended Consolidated Class Action Complaint in the above-captioned matter, which is being submitted contemporaneously with this Notice of Motion, Defendants Google LLC, Alphabet Inc., and YouTube LLC will move this Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, at a date and time to be set by the Court, for an Order dismissing with prejudice certain of the federal antitrust claims in Counts I and II of the Amended Consolidated Class Action Complaint, No. 21-MD-3010 (PKC), ECF No. 408, on the ground that the Publisher Plaintiffs have failed to state a claim upon which relief can be granted. *See* Fed. R. Civ. P. 12(b)(6); *Ashcroft v. Iqbal*, 556 U.S. 662 (2009); *Bell Atl. Corp. v. Twombly*, 550 U.S. 544 (2007).

Dated: February 3, 2023

Respectfully Submitted,

/s/ Justina K. Sessions

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